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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

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JARED M. BAILEY,

Plaintiff,

Civil Action No.:

- against -

RULE 7.1 STATEMENT

MOHAMMED R. RAHMAN, AMERICAN NATIONAL RED CROSS, and ELEMENT FLEET CORPORATION.

Defendants.

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable United States District Judges and Magistrate Judges to evaluate possible disqualification or recusal, the undersigned, as counsel of record for Defendants, American National Red Cross and Element Fleet Corporation, hereby certifies that:

AMERICAN NATIONAL RED CROSS is a not-for-profit corporation organized and existing by virtue of an Act of the United States Congress, and there are no corporate parents, subsidiaries or affiliates that are publicly held. Element Fleet Management Corp., a Canadian corporation that is publicly traded on the Canadian stock exchange, is the parent company of ELEMENT FLEET CORPORATION.

Dated:

White Plains, New York

September 29, 2022

Truly Yours,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

Junday Koluk

By:

Lindsay J. Kalick
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